

**BEFORE THE DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation

Against:

MICHAEL JAMES REYNOLDS, M.D.

Certificate # A-23823

Respondent.

File No: 09-91-15357

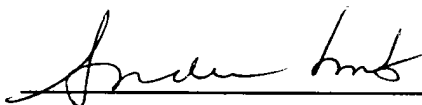
DECISION AND ORDER

The attached Stipulation and Waiver is hereby adopted by the Division of Medical Quality of the Medical Board of California, Department of Consumer Affairs, State of California, as its Decision in the above-entitled matter.

This Decision shall become effective on May 20, 1996.

DATED April 19, 1996.

**DIVISION OF MEDICAL QUALITY
MEDICAL BOARD OF CALIFORNIA**



**Anabel Anderson Imbert, M.D., President
Division of Medical Quality**

1 DANIEL E. LUNGREN, Attorney General
of the State of California
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7
8 BEFORE THE
DIVISION OF MEDICAL QUALITY
9 MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation) No. 09-91-15357
12 Against:)
MICHAEL JAMES REYNOLDS. M.D.) OAH No. L9502074
13 Visalia Health Center)
14 Visalia, California 93291) STIPULATION
Physician's & Surgeon's) AND WAIVER
Certificate No. A23823)
15 Respondent.)
16

17 IT IS HEREBY STIPULATED by and between Michael James
18 Reynolds, M.D., the respondent in this matter, by and through his
19 attorney, George Strasser, and Ronald Joseph, as Executive
20 Director of the Medical Board of California, Department of
21 Consumer Affairs, by and through his attorney, Mara Faust, Deputy
22 Attorney General, that the following matters are true:

23 1. On August 7, 1995, the Medical Board of California
24 filed Amended Accusation No. 09-91-15357 against Michael James
25 Reynolds, M.D. (hereinafter referred to as the "respondent").

26 2. The complainant in the Accusation, Doug Laue, was
27 the Acting Executive Director of the Board and brought the
28 Accusation in his official capacity only.

1 3. Respondent has retained as his attorney, George
2 Strasser. Respondent has discussed with his counsel the charges
3 and allegations and violations of the California Business and
4 Professions Code alleged in the Amended Accusation, and has been
5 fully advised of his rights to hearing on the charges and
6 allegations contained in Amended Accusation No. 09-91-15357, his
7 right to reconsideration and appeal, and all other rights
8 afforded to him under California Code of Regulations (Gov. Code,
9 § 11370, et seq.) and the laws of the State of California.

10 4. Respondent hereby freely and voluntarily waives
11 his rights to a hearing on the charges and allegations contained
12 in the above-mentioned Amended Accusation in order to enter into
13 this Stipulation and Waiver and that he further agrees to waive
14 his right to reconsideration, judicial review, and any and all
15 rights which may be accorded him by the Administrative Procedure
16 Act and the laws of the State of California, except his right to
17 petition for termination or modification of probation pursuant to
18 Government Code section 11522.

19 5. All admissions of fact and conclusions of law
20 contained in this Stipulation are made exclusively for this
21 proceeding and any future proceedings between the Board and the
22 respondent, but not otherwise, and shall not be deemed to be
23 admissions for any purpose in any other administrative, civil or
24 criminal action, forum or proceeding.

25 6. Respondent's license history and status as set
26 forth at paragraph 2 of the Amended Accusation are true and
27 correct and respondent's address of record is as set forth in the
28 caption of this Stipulation and Waiver. (A copy of the Amended

1 Accusation No. 09-91-15357 is attached hereto as Exhibit A.)

2 7. For purposes of the settlement of the action
3 pending against respondent in case No. L950274 and to avoid a
4 lengthy administrative hearing, respondent admits there is a
5 factual and legal basis for the imposition of disciplinary action
6 against him pursuant to some of the allegations of Amended
7 Accusation No. 09-91-15357. Respondent admits that as to the
8 first, second and fourth causes of action he violated Business
9 and Professions Code sections 2234(b) and 2234(c).

10 8. Respondent further admits he failed to adequately
11 review the EFM strip and failed to perform a timely cesarian
12 section on the patient A.F. Respondent further admits that he
13 improperly used a vacumer tractor on A.M.'s fetus and failed to
14 adequately interpret the fetal heart monitor strip from A.M.'s
15 fetus. Respondent also allowed patient B.S. to stay fully
16 dilated in second stage pregnancy for five hours.

17 9. Respondent acknowledges that he shall not be
18 permitted to withdraw from this stipulation unless it is rejected
19 by the Medical Board of California.

20 10. It is acknowledged by all parties hereto that this
21 stipulation constitutes an offer in settlement to the Medical
22 Board of California and is not effective until adoption by the
23 Board. In the event this stipulation is not adopted by the
24 Board, nothing herein recited shall be construed as a waiver of
25 respondent's rights to a hearing or as an admission of the truth
26 of any of the matters charged in the Amended Accusation.

27 11. IT IS HEREBY STIPULATED AND AGREED that the
28 Medical Board of California, upon its approval of the Stipulation

1 and Waiver herein set forth, may without further notice, prepare
2 a decision and enter the following order, whereby Physician and
3 Surgeon's Certificate No. A-23823 issued to respondent Michael
4 James Reynolds, M.D., by the Medical Board of California, is
5 hereby revoked; provided, however, that execution of this order
6 of revocation is stayed and respondent is placed on probation for
7 a period of seven (7) years, upon the following terms and
8 conditions. Within 15 days after the effective date of this
9 decision, the respondent shall provide the Division, or its
10 designee, proof of service that respondent has served a true copy
11 of this decision on the Chief of Staff or the Chief Executive
12 Officer at every hospital where privileges or membership are
13 extended or where respondent is employed to practice medicine and
14 on the Chief Executive Officer at every insurance carrier where
15 malpractice insurance coverage is extended to respondent. The
16 terms and conditions are as follows:

17 **A. ACTUAL SUSPENSION**

18 As part of probation, respondent is suspended from the
19 practice of medicine for 30 days, beginning the thirtieth (30th)
20 day after the effective date of this decision.

21 **B. PSYCHIATRIC EVALUATION**

22 It is acknowledged that respondent has already
23 undergone a neuropsychiatric evaluation by Richard Adams, Ph.D.,
24 who has furnished an evaluation to the diversion program.
25 Respondent agrees to submit to further evaluations (and
26 psychological testing, if deemed necessary) by a
27 Division-appointed psychiatrist, who shall furnish an evaluation
28 report to the Division or its designee if required by the

1 Division. The respondent shall pay the cost of the psychiatric
2 evaluation.

3 If respondent is required by the Division or its
4 designee to undergo psychiatric treatment, respondent shall
5 within 30 days of the requirement notice submit to the Division
6 for its prior approval the name and qualifications of a
7 psychiatrist of respondent's choice. Respondent shall undergo
8 and continue psychiatric treatment until further notice from the
9 Division or its designee. Respondent shall have the treating
10 psychiatrist submit quarterly status reports to the Division or
11 its designee indicating whether the respondent is capable of
12 practicing medicine safely.

13 C. PSYCHOTHERAPY

14 It is acknowledged that respondent has been treated for
15 three years by a psychotherapist, Paul C. Bennett, L.C.S.W.,
16 approved by the Diversion program. If required by the Division,
17 respondent shall submit for prior approval the name and
18 qualifications of a psychologist of respondent's choice. Upon
19 approval of either the L.C.S.W. or a psychologist, respondent
20 shall undergo and continue treatment until the Division or its
21 designee deems that no further psychotherapy is necessary.
22 Respondent shall have the treating psychotherapist submit
23 quarterly status reports to the Division or its designee. The
24 Division or its designee may require respondent to undergo
25 psychiatric evaluations by a Division-appointed psychiatrist.
26 The respondent shall pay the cost of therapy and evaluations.

27 D. MONITORING

28 Within 30 days of the effective date of this decision,

1 respondent shall submit to the Division or its designee for its
2 prior approval a plan of practice in which respondent's practice
3 shall be monitored by another physician in respondent's field of
4 practice, who shall provide periodic reports to the Division or
5 its designee.

6 If the monitor resigns or is no longer available,
7 respondent shall, within 15 days, move to have a new monitor
8 appointed, through nomination by respondent and approval by the
9 Division or its designee.

10 Respondent is prohibited from engaging in solo
11 practice.

12 **E. DRUGS & ABSTAIN FROM USE**

13 Respondent shall abstain completely from the personal
14 use or possession of controlled substances as defined in the
15 California Uniform Controlled Substances Act, and dangerous drugs
16 as defined by Section 4211 of the Business and Professions Code,
17 or any drugs requiring a prescription. This prohibition does not
18 apply to medications lawfully prescribed to respondent for a *bona*
19 *fide* illness or condition by another practitioner.

20 **F. BIOLOGICAL FLUID TESTING**

21 Respondent shall immediately submit to biological fluid
22 testing, at respondent's cost, upon the request of the Division
23 or its designee.

24 **G. DIVERSION PROGRAM**

25 It is acknowledged that respondent enrolled and has
26 participated in the Division's Diversion Program continuously
27 since February 28, 1992. He shall continue in the program until
28 the Division determines that further treatment and rehabilitation

1 is no longer necessary. Quitting the program without permission
2 or being expelled for cause shall constitute a violation of
3 probation by respondent.

4 **H. EDUCATION COURSE**

5 Within 90 days of the effective date of this decision,
6 and on an annual basis thereafter, respondent shall submit to the
7 Division or its designee for its prior approval an educational
8 program or course to be designated by the Division, which shall
9 not be less than 40 hours per year, for each year of probation.
10 This program shall be in addition to the Continuing Medical
11 Education requirements for re-licensure. Following the
12 completion of each course, the Division or its designee may
13 administer an examination to test respondent's knowledge of the
14 course. Respondent shall provide proof of attendance for 65
15 hours of continuing medical education of which 40 hours were in
16 satisfaction of this condition and were approved in advance by
17 the Division or its designee.

18 **I. ORAL CLINICAL OR WRITTEN EXAM**

19 Respondent shall take and pass an oral clinical exam in
20 a subject to be designated and administered by the Division, or
21 its designee. This examination shall be taken within 90 days
22 after the effective date of this decision. If respondent fails
23 the first examination, respondent shall be allowed to take and
24 pass a second examination, which may consist of a written as well
25 as an oral examination. The waiting period between the first and
26 second examinations shall be at least three months. If
27 respondent fails to pass the first and second examinations,
28 respondent may take a third and final examination after waiting a

1 period of one year. Failure to pass the oral clinical
2 examination within 18 months after the effective date of this
3 decision shall constitute a violation of probation. The
4 respondent shall pay the costs of all examinations.

5 If respondent fails to pass the first examination,
6 respondent shall be suspended from the practice of medicine until
7 a repeat examination has been successfully passed, as evidenced
8 by written notice to respondent from the Division or its
9 designee.

10 **J. MEDICAL EVALUATION**

11 Within 30 days of the effective date of this decision,
12 and on a periodic basis thereafter as may be required by the
13 Division or its designee, respondent shall undergo a medical
14 evaluation by a Division-appointed physician who shall furnish a
15 medical report to the Division or its designee.

16 If respondent is required by the Division or its
17 designee to undergo medical treatment, respondent shall, within
18 30 days of the requirement notice, submit to the Division or its
19 designee for its prior approval the name and qualifications of a
20 physician of respondent's choice. Upon approval of the treating
21 physician, respondent shall undergo and continue medical
22 treatment until further notice from the Division or its designee.
23 Respondent shall have the treating physician submit quarterly
24 reports to the Division or its designee indicating whether the
25 respondent is capable of practicing medicine safely. The
26 respondent shall pay the cost of the medical evaluation.

27 **K. PROHIBITED PRACTICE**

28 During probation, respondent is prohibited from

1 practicing obstetrics, including the delivery of babies. It is
2 acknowledged that in his practice at the Fresno County Health
3 Services agency, pregnant patients are seen but no deliveries
4 occur there. Respondent shall at the earliest opportunity, refer
5 such patients for obstetrical care. At the earliest opportunity,
6 respondent shall inform applicable patients that respondent is
7 unable to perform an indicated treatment or procedure.

8 **L. OBEY ALL LAWS**

9 Respondent shall obey all federal, state and local
10 laws, all rules governing the practice of medicine in California,
11 and remain in full compliance with any court ordered criminal
12 probation, payments and other orders.

13 **M. QUARTERLY REPORTS**

14 Respondent shall submit quarterly declarations under
15 penalty of perjury on forms provided by the Division, stating
16 whether there has been compliance with all the conditions of
17 probation.

18 **N. PROBATION SURVEILLANCE PROGRAM COMPLIANCE**

19 Respondent shall comply with the Division's probation
20 surveillance program. Respondent shall, at all times, keep the
21 Division informed of his or her addresses of business and
22 residence which shall both serve as addresses of record. Changes
23 of such addresses shall be immediately communicated in writing to
24 the Division. Under no circumstances shall a post office box
25 serve as an address of record.

26 Respondent shall also immediately inform the Division,
27 in writing, of any travel to any areas outside the jurisdiction
28 of California which lasts, or is contemplated to last, more than

1 thirty (30) days.

2 **O. INTERVIEW WITH THE DIVISION, ITS DESIGNEE OR ITS DESIGNATED**
3 **PHYSICIAN(S)**

4 Respondent shall appear in person for interviews with
5 the Division, its designee or its designated physician(s) upon
6 request at various intervals and with reasonable notice.

7 **P. TOLLING FOR OUT-OF-STATE PRACTICE, RESIDENCE OR IN-STATE**
8 **NON-PRACTICE**

9 In the event respondent should leave California to
10 reside or to practice outside the State or for any reason should
11 respondent stop practicing medicine in California, respondent
12 shall notify the Division or its designee in writing within ten
13 days of the dates of departure and return or the dates of
14 non-practice within California. Non-practice is defined as any
15 period of time exceeding thirty days in which respondent is not
16 engaging in any activities defined in Sections 2051 and 2052 of
17 the Business and Professions Code. All time spent in an
18 intensive training program approved by the Division or its
19 designee shall be considered as time spent in the practice of
20 medicine. Periods of temporary or permanent residence or
21 practice outside California or of non-practice within California,
22 as defined in this condition, will not apply to the reduction of
23 the probationary period.

24 **Q. COMPLETION OF PROBATION**

25 Upon successful completion of probation, respondent's
26 certificate shall be fully restored.

27 **R. VIOLATION OF PROBATION**

28 If respondent violates probation in any respect, the

5
1 Division, after giving respondent notice and the opportunity to
2 be heard, may revoke probation and carry out the disciplinary
3 order that was stayed. If an accusation or petition to revoke
4 probation is filed against respondent during probation, the
5 Division shall have continuing jurisdiction until the matter is
6 final, and the period of probation shall be extended until the
7 matter is final.

8 **S. PROBATION COSTS**

9 Respondent shall pay the costs associated with
10 probation monitoring for each and every year of probation. Such
11 costs shall be made payable to the Board at the end of each
12 fiscal year. Failure to pay such costs shall constitute a
13 violation of probation. *Such costs shall not exceed \$2,400⁰⁰*
14 *per year.* LL MF

14 **T. COST RECOVERY**

15 The respondent is hereby ordered to reimburse the
16 Division the amount of \$3,500.00 within ten months from the
17 effective date of this decision for its investigative and
18 prosecution costs. The sum of \$3,500.00 shall be paid in four
19 quarterly installments of \$875.00. The first installment is due
20 within thirty days from the effective date of this decision with
21 each subsequent installment due within three months of the
22 previous installment, and the last installment due within ten
23 months of the effective date of the decision. Failure to
24 reimburse the Division's cost of its investigation and
25 prosecution shall constitute a violation of the probation order,
26 unless the Division agrees in writing to payment by an
27 installment plan because of financial hardship. The filing of
28 bankruptcy by the respondent shall not relieve the respondent of

1 his/her responsibility to reimburse the Division for its
2 investigative and prosecution costs.

3 **U. LICENSE SURRENDER**

4 Following the effective date of this decision, if
5 respondent ceases practicing due to retirement, health reasons or
6 is otherwise unable to satisfy the terms and conditions of
7 probation, respondent may voluntarily tender his/her certificate
8 to the Board. The Division reserves the right to evaluate the
9 respondent's request and to exercise its discretion whether to
10 grant the request, or to take any other action deemed appropriate
11 and reasonable under the circumstances. Upon formal acceptance
12 of the tendered license, respondent will no longer be subject to
13 the terms and conditions of probation.

14 Dated: March 6, 1996

15 DANIEL E. LUNGREN, Attorney General
16 of the State of California
17 JANA TUTON, Supervising
Deputy Attorney General

18 Mara Faust
19 MARA FAUST
20 Deputy Attorney General

21 Attorneys for Complainant

22 DATED: Feb 14, 1996

23 George L. Strasser
24 George Strasser

25 Attorney for Respondent
26
27
28

1 I hereby certify that I have read this Stipulation and
2 Waiver in its entirety, that my attorney of record has fully
3 explained the legal significance and consequence thereof, that I
4 fully understand all of the same and in witness thereof I affix
5 my signature this 14 day of Feb. 1996 at Fresno,
6 Calif.

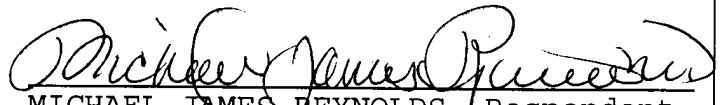
7 
8 MICHAEL JAMES REYNOLDS, Respondent
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EXHIBIT A

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 JANA L. TUTON, Supervising
Deputy Attorney General
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6 Attorneys for Complainant
7

8 BEFORE THE
DIVISION OF MEDICAL QUALITY
9 MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Accusation) No. 09-91-15357
12 Against:)
MICHAEL JAMES REYNOLDS. M.D.) FIRST AMENDED ACCUSATION
13 Visalia Health Center)
14 Visalia, California 93291)
Physician's & Surgeon's)
15 Certificate No. A23823)
16 Respondent.)

17 Complainant, Dixon Arnett, alleges as follows:
18

19 1. He is the Executive Director of the Medical Board
20 of California (hereinafter "Board") and makes and files this
21 amended accusation solely in his official capacity.

22 2. On or about July 7, 1970, respondent Michael James
23 Reynolds, M.D. (hereinafter "respondent") was issued physician's
24 and surgeon's certificate number A23823 by the Board. At all
25 times pertinent herein, said certificate was and currently is, in
26 full force and effect.

27 3. Sections 2220 and 2234 of the Business and
28 Professions Code (hereinafter "Code") provide in pertinent part,
that the Division of Medical Quality may take action against the

1 holder of a physician's and surgeon's certificate who is guilty
2 of unprofessional conduct.

3 4. Section 125.3 of the Code provides that the Board
4 may request the administrative law judge to direct a licensee
5 who has committed a violation or violations of the licensing act
6 to pay a sum not to exceed the reasonable costs of the
7 investigation and enforcement of the case.

8 5. Section 2234, subdivision (b) of the Code provides
9 that gross negligence constitutes grounds for discipline.

10 6. Section 2234, subdivision (c) of the Code provides
11 that repeated negligence acts constitute grounds for discipline.

12 7. Section 2234, subdivision (d) of the Code provides
13 that incompetence constitutes grounds for discipline.

14 8. Respondent is subject to disciplinary action
15 pursuant to sections 2220 and 2234 of the code in that respondent
16 is guilty of unprofessional conduct within the meaning of
17 sections 2234(b), (c), and (d) as follows:

18 A. Patient A.F.^{1/}

19 (1) On July 13, 1991, at 10:30 a.m., A.F. (a
20 primigravida) was admitted to Loma Linda University Hospital with
21 a complaint of vaginal bleeding. The patient's estimated date of
22 confinement to deliver her baby was July 12, 1991. A.F. was
23 having 6 minute interval contractions of moderate intensity and
24 "normal show" bleeding. A.F. was discharged at 11:00 a.m. At
25 2:00 p.m. the same day, A.F. returned, and an electronic fetal
26 monitor (EFM) tracing was done revealing uterine irritability,
27

28 1. The full names of patients referenced herein will be
available to respondent upon request for discovery.

1 reduced variability, and decelerations, some which were late.
2 Respondent performed a vaginal exam and did an ultrasound screen
3 at 4:35 p.m. Shortly thereafter A.F. was discharged.

4 (2) On July 14, 1991, at 8:15 a.m. A.F. returned
5 to the hospital with 2-4 minute contractions and passage of
6 bloody fluid. The EFM strip reveals lack of variability with
7 consistent late decelerations. Cesarean section was delayed from
8 8:40 to 9:38 as regional anesthesia was attempted. At 9:50 A.F.
9 delivered a liveborn male weighing 3309 gms. with fetal asphyxia
10 and profound abruptio placentae.

11 (3) Respondent's failure to either review the EFM
12 strip of July 13, 1991, or if he reviewed the strip, then
13 respondent's failure to recognize an abnormal strip, each
14 constitute gross negligences and/or incompetence.

15 (4) Respondent's failure to do an emergency
16 cesarean section on A.F. within a thirty minute interval of the
17 EFM strip on July 14, 1991, constitutes negligence and/or
18 incompetence.

19 B. Patient A.M.

20 (1) On August 18, 1991, 3:00 a.m., patient A.M.
21 (a multigravida) was admitted to Loma Linda University Hospital,
22 at 40-2/7 weeks into her pregnancy with a cervix at 2 cm, and 50%
23 contractions at five minute intervals. At this same time A.M.'s
24 membranes ruptured. At 7:45 a.m., the same day, respondent
25 examined A.M.
26 and applied the fetal scalp electrode to the fetus for the fetal
27 heart monitor.

28 ///

1 (2) At 10:15 a.m. of the same day a
2 perinatologist saw A.M. after a prolonged deceleration where the
3 recovery was good.

4 (3) Respondent evaluated A.M. at 12:05 p.m.,
5 where her cervix was 7-8 cm. dilated, and +1 station. At 12:45
6 p.m. there were two "late decelerations" with "slow recovery".
7 At 1:10 p.m., a variable deceleration occurred after A.M. had a
8 contraction.

9 (4) At 1:15 p.m. respondent attempted a vacuum
10 assisted delivery without success. Respondent ordered forceps
11 applied and that also didn't work. At 2:10 respondent noticed
12 the caput (fetal scalp) was +2 station and the vertex -1 station
13 as he ordered A.M. to be prepared for a cesarean section.

14 (5) At 2:24 A.M. was delivered of a liveborn male
15 weighing 3070 gms. but the infant had seizures. A CT scan of the
16 infant revealed a hemorrhage along the tentorium.

17 (6) Respondent's application of vacuumex tractor
18 to bring a vertex down from 0 to +2 station constitutes gross
19 negligence and/or incompetence.

20 (7) Respondent's lack of ability to interpret the
21 fetal heart monitor constitutes gross negligence and/or
22 incompetence. The use of the vacuum and the use of forceps each
23 constitute acts of gross negligence and/or incompetence.

24 C. Patient N.N.

25 (1) On February 15, 1992, at 12:40 p.m., patient
26 N.N. (a multigravida) was admitted to Kaweah Delta District
27 Hospital at approximately 41 weeks into her pregnancy.
28 Respondent induced labor of N.N. with prostin to the cervix.

1 N.N. developed frequent uterine contractions with reduced
2 variability and some decelerations. Respondent then performed an
3 emergency cesarean section on N.N. to deliver the baby.
4 Respondent's failure to use oxytocin to induce labor rather than
5 prostin, a prostaglandin, constitutes negligence.

6 D. Patient B.S.

7 (1) On January 26, 1992, patient B.S. (a
8 primigravida) was admitted to Kaweah Delta District Hospital at
9 40 weeks into her pregnancy. Respondent handled B.S.'s delivery
10 and allowed B.S. to remain in the second stage of pregnancy,
11 completely dilated for five hours before commencing a vacuum
12 assisted delivery. Respondent's failure to have re-evaluated
13 B.S. after two hours of complete dilation and respondent's
14 failure to consider an assisted delivery at that time constitutes
15 negligence.

16 E. Patient C.R.

17 (1) On February 13, 1992, patient C.R. (a
18 multigravida) was admitted to Kaweah Delta District Hospital at 39
19 weeks into her pregnancy. Respondent handled C.R.'s delivery and
20 mistakenly evaluated the fetus as a frank breech rather than a
21 footling breech. Respondent assisted the vaginal delivery without
22 forceps in the delivery room and without ultrasound or flat film
23 taken to confirm the location of the fetal head. Respondent's
24 failure to deliver the fetus caesarean section for a footling
25 breech and/or his failure to determine the location of the fetal
26 head constitutes negligence.

27 ///

28 ///

1 F. The acts set forth in paragraphs A (3-5), B
2 (6-7), C, D, and E or any combination thereof, constitute
3 repeated negligent acts in violation of Code section 2234(c).

4 WHEREFORE, COMPLAINANT PRAYS that the Medical Board
5 hold a hearing on the matters alleged herein and following said
6 hearing issue a decision:

7 1. Revoking or suspending physician's and surgeon's
8 certificate number A23823 heretofore issued to respondent Michael
9 James Reynolds, M.D.

10 2. Prohibiting respondent from supervising
11 physician's assistants; and

12 3. Taking such other and further action as it deems
13 proper, including the payment of reasonable costs of
14 investigation and prosecution.

15 DATED: August 7, 1995

16
17 

18 DIXON ARNETT
19 Medical Board of California
20 State of California

21 Complainant

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